

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PLANCK LLC, d/b/a, PATCH MEDIA,

*Plaintiff,*

– against –

PARTICLE MEDIA, INC., d/b/a, NEWS BREAK,  
JEFF ZHENG, and VINCENT WU,

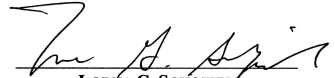
*Defendants.*  
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Case No. 20-CV-10959 (LGS)

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER TO  
PRODUCE A DOCUMENT**

SO ORDERED.

Dated: April 1, 2022  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

LORNA G. SCHOFIELD, District Judge:

**WHEREAS** Request No. 19 of Defendants’ First Set of Requests for Production of Documents to Plaintiff requests production of “[a]ll contracts, agreements, or licenses between Patch and any news aggregator, including Yahoo News, Google News, Apple News, and Smart News”; and

**WHEREAS** Plaintiff has in its possession, custody, or control an agreement between Plaintiff and Microsoft Online Inc. (the “MSN Agreement”) that is responsive to Defendants’ Request No. 19; and

**WHEREAS** the MSN Agreement provides that Plaintiff may not produce it absent a court order; and

**WHEREAS** Plaintiff does not object to producing the MSN Agreement in discovery as long as doing so complies with its confidentiality provisions:

**NOW IT IS HEREBY ORDERED** that Plaintiff shall produce the MSN Agreement within 5 business days of this Stipulation being “So Ordered” by the Court.

Dated: March 30, 2022

Dated: March 30, 2022

*/s/ Peter B. Schalk*

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*/s/ Kelly M. Klaus*

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*Attorneys for Defendants Particle Media,  
Inc., d/b/a, News Break, Jeff Zheng, and  
Vincent Wu*

~~SO ORDERED~~

~~XXXXXXXXXXXXXXXXXXXXXXXXXXX~~  
Dated: \_\_\_\_\_

~~KORNA G SCHOFIELD~~  
~~United States District Judge~~